

To Planning Inspectorate
sizewellc@planninginspectorate.gov.uk
By email only

12th May 2021

Dear Sir/Madam

**R: The Sizewell C Project Development Consent Order Application (Reference: EN010012)
The RSPB and SWT Response Submitted for Deadline 1: Request to attend and make oral
representations at Issue Specific Hearings**

The RSPB and SWT have significant concerns regarding the ecological and environmental impacts of Sizewell C and the methods used in the assessment of those impacts, as outlined in our Relevant Representations [RR-1059 (RSPB) and RR-1180 (SWT)]. Given our key areas of concern, we consider it likely that we will wish to attend the following issue specific hearings, and may need to request permission to make oral representations:

- Policy and Need
- The Draft Development Consent Order – we would like to suggest that this also includes the Draft Deemed Marine Licence, section 106 and associated additional consents, permissions, licences required.
- Associated Development Sites of the Two Village Bypass, Sizewell Link Road, Northern Park and Ride, Southern Park and Ride, Green Rail Link, Freight Management Facility and Yoxford Roundabout. For each to include the principle of need, alternatives, highway impacts, LVIA, ecology, air quality, noise, drainage, lighting, access, archaeology, minerals, soils and agriculture, PROW – due to some potential protected species issues we may need to attend and possibly need to request permission to make oral representations.
- Impacts of the operation of night-time trains along the rail corridor
- Effect of the proposed development on the AONB designation
- Coastal Geomorphology to cover the permanent and temporary Beach Landing Facilities proposed Hard and Soft Coastal Defences, drainage outfall and the relationship to climate change and resilience
- Funding Case – depending on topics included we may wish to attend and need to request permission to make oral representations.
- Socio economic issues including skills development, accommodation impacts, tourism impacts, supply chain, and opportunities for local people and businesses – again due to involvement of tourism and local impacts we would wish to attend and may need to request permission to make oral representations.
- Water supply – we would welcome clarification on whether this would include hydrological considerations e.g. ground water, surface water, water chemistry, Source Protection Zones, water dependent resources and ecological receptors including relevance for protected sites and protected species– and if not, suggest that an ISH would be required for those

additional hydrological issues, which we would wish to attend and may request permission to make oral representations.

- Flood Risk
- Habitats Regulations, Water Framework Directive¹ and Imperative Reasons of Overriding Public Interest (IROPI) – we can say with certainty now that we would wish to attend and will be requesting permission to make oral representations. We also wish to add that this ISH should include a specific agenda item on Habitat Regulation requirements on Appropriate Assessments and alternative solutions and compensation measures along with IROPI.

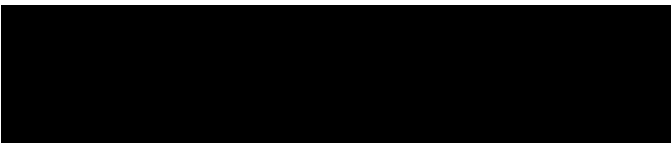
In addition, as set out in our Procedural Deadline A Response, we would like to suggest that the following are considered for ISHs

- Additional Legislative Requirements – specifically on Environmental Impact Assessments
- Biodiversity and ecology – both terrestrial and marine – including
 - Protected species such as European Protected Species e.g. natterjack toads and all species of bats.
 - All Protected sites (including marine sites)
 - Consideration of **both** cumulative and in-combination effects to reflect the various legislative requirements for both consideration of multiple effects from the Application on a particular e.g. protected site and/or protected species and the need to consider potential additional effects from the Sizewell C Application on other applications and the potential additional effects from other applications on this Sizewell C Application.

We will provide confirmation within our Written Representations (at Deadline 2) on both the need to attend and make oral representations and request permission to make oral representations to the Examining Authority once the proposed agendas are provided, including the issues we would wish to raise.

Please can you confirm whether this approach is acceptable to the Examining Authority?

Yours faithfully



Rosie Sutherland
On behalf of the RSPB and SWT

¹ We would like to suggest that this includes the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and the Environmental Permitting (England and Wales) Regulations 2016 as amended by their respective EU Exit Regulations.